

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA**

CIVIL ACTION NO. 3:11-CV-00524-RGJ-KLH

IAN J. JACKSON

CHIEF JUDGE ROBERT G. JAMES

VERSUS

LOUISIANA STATE UNIVERSITY, ET AL

**MOTION FOR EXTENSION OF TIME
TO FILE RESPONSIVE PLEADINGS**

NOW INTO COURT, through undersigned counsel, come defendants Louisiana Tech University and the Louisiana Tech Police Department, who move this Honorable Court as follows:

1.

Undersigned counsel have been assigned to defend the appearing defendants in this matter.

2.

Undersigned counsel recently received this defense assignment, and has not yet had the opportunity to receive additional file materials, investigate the claims of Plaintiff or the defenses available to appearing defendants in order to prepare responsive pleadings on their behalf.

3.

Accordingly, appearing defendants request that they be granted an extension of time of forty (40) days, within which to file responsive pleadings.

4.

Appearers have made no prior request for an extension of time to respond to Plaintiff's complaint.

5.

Plaintiffs filed the complaint on their own behalf. A call was placed to the phone number in the complaint on June 7, 2011. Undersigned attorney received a voice recording. For purposes of LR 7.9W, it is assumed that Plaintiff would oppose this motion. However, appearers respectfully suggest that a delay of Forty (40) days will not unduly prejudice Plaintiff.

WHEREFORE, appearers pray that this Court grant them an extension of time of forty (40) days within which to file responsive pleadings in this matter.

Respectfully submitted,

James D. "Buddy" Caldwell
Attorney General

s// Kenneth A. "Andy" Brister
KENNETH A. "ANDY" BRISTER
SPECIAL ASSISTANT ATTORNEY GENERAL
BAR ROLL NO. 19497
Phone: (318) 559-5800
Fax: (318) 559-5680
P.O. BOX 266
LAKE PROVIDENCE, LA. 71254
andy.brister@gmail.com

CERTIFICATE OF SERVICE

I certify that the foregoing has been filed using the Court's CM/ECF system, and that notice of filing and copy of same will be served upon the pro se plaintiff herein by depositing them in the United States mail, properly addressed and first class postage prepaid, on the 8th day of June, 2011, as follows:

Ian J. Jackson
839 Beech Springs Rd.
Jonesboro, LA 71251

Lake Providence, Louisiana, this 8th day of June, 2011.

s// Kenneth A. "Andy" Brister
KENNETH A. "ANDY" BRISTER
SPECIAL ASSISTANT ATTORNEY GENERAL
BAR ROLL NO. 19497
Phone: (318) 559-5800
Fax: (318) 559-5680
P.O. BOX 266
LAKE PROVIDENCE, LA. 71254
andy.brister@gmail.com